

EXHIBIT E

ALAN ROBIN, M.D. 8/6/2014

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF ILLINOIS
3 EAST ST. LOUIS DIVISION
4

5 CHARLENE EIKE, et al.
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8 Plaintiffs Case No.
9 vs. 3:12-cv-01141-DRH-
10 ALLERGAN, INC., et al. DGW

11 Defendants
12 _____
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16 VIDEOTAPED DEPOSITION OF ALAN ROBIN, M.D.
17 Towson, Maryland
18 Wednesday August 6, 2014
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24 Reported by: LINDA LINDSEY, CSR
25

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1 A No.

2 Q Um, quick question about, we've talked --
3 we've talked a few times about generic pharmaceutical
4 companies, and two of my client's Falcon and Sandoz in
5 this case, do you have any specific criticisms of Sandoz
6 and Falcon?

7 A No, none whatsoever.

8 Q Okay. And I don't -- again, this may be
9 outside of your expertise and you may -- you can
10 certainly tell me that, but do you understand that when
11 it comes to generic manufacturers such as Sandoz and
12 Falcon, that they do not have the ability to change
13 things like warnings or labels or size of the dropper?

14 MR. CORNFELD: Object. Lack of foundation.

15 A I do know that.

16 Q Okay. And -- okay. And you know that that's
17 dictated by the brand drug, that is the --

18 A Correct.

19 Q -- the dropper, labelling?

20 A Correct. The brand --

21 MR. CORNFELD: Object. Lack of foundation.

22 BY MS. COHEN:

23 Q Okay. And you've always understood that to
24 be the case, correct?

25 MR. CORNFELD: Same objection.

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1 A I'm not sure I can say always, but I
2 understand that.

3 Q Okay.

4 A Correctly.

5 Q You agree that a major issue in medical
6 compliance is patient's application of eye drops?

7 A Not medical compli -- ophthalmic compliance,
8 it's a factor, it is not the major factor.

9 Q And you agree with the statement "that a
10 standardize technique for patients to use eye drops does
11 not exist"?

12 A I may have said that actually.

13 Q Okay. And you agree "that adherence to
14 medications and specifically eye drops is very complex,
15 you really have to communicate with patients better"?

16 A I probably said that also.

17 Q Do you agree with the statement "that eye
18 drop medications have been around a long time and their
19 success relies upon an individual actually remembering
20 to take the drops and then getting the drop in the eye"?

21 A Correct.

22 Q And then, have you said that "this rarely
23 happens", people want quick --

24 A I didn't hear.

25 Q This rarely?

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1 STATE OF MARYLAND

2 COUNTY OF BALTIMORE

3 I, Linda Lindsey, CSR, a Notary Public of the
4 State of Maryland, do hereby certify that the within
5 named, ALAN ROBIN, M.D., was deposed at the time and
6 place herein set out, and after having been duly sworn
7 by me, was interrogated by counsel.

8 I further certify that the examination was
9 recorded stenographically by me, and this transcript is
10 a true record of the proceedings.

11 I further certify that the stipulations made
12 herein were entered into by counsel in my presence.

13 I further certify that I am not of counsel to
14 any of the parties, nor an employee of counsel, nor
15 related to any of the parties, nor in any way interested
16 in the outcome of this action.

17 As witness my hand and notarial seal this
18 11th day of August, 2013.

19 My commission expires: December 21, 2015

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Linda Lindsey, CSR,

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Notary Public

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